

EXHIBIT B

Time and Expense Invoice

RANDI ELLIS, P.C.
ATTORNEY AT LAW*
(A LIMITED LIABILITY COMPANY)

EMAIL: RANDI@RANDIELLIS.COM

*LICENSED IN LOUISIANA AND TEXAS

United States Bankruptcy Court
District of New Jersey
402 East State Street
Trenton, NJ 08608

August 14, 2023
Client: 001000
Matter: 000001
Invoice #: 185
Resp. Atty: LMW
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RE: In Re: LTL Management, LLC
Case No.: 23-12825-MBK
Judge: Michael B. Kaplan
Chapter: 11

For Professional Services Rendered Through July 31, 2023

SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/1/2023	RE	B195	Additional return travel to Houston after MTD Hearing.	1.4	\$507.50	\$710.50
7/1/2023	RE	B200	Review of Debtor's Objections to TCC 2nd Amended Exhibit List (.1); Review of Joint Stipulation on Admission of Evidence (.1); Review of TCC's Amended Exhibit List (.1); review of Barnes Law Group's Verified 2019 Statement (.1).	0.4	\$1,015.00	\$406.00
7/2/2023	RE	B230	Review (continued) of Amended Plan Red-Line and TDP (3.6).	3.6	\$1,015.00	\$3,654.00
7/2/2023	RE	B200	Prepare for zoom call set for tomorrow with experts.	2.5	\$1,015.00	\$2,537.50
7/3/2023	RE	B200	Zoom call with counsel and expert (1.6); Communications with counsel regarding experts and filings related to same (.4); Review of materials and links sent to experts (2.8).	4.8	\$1,015.00	\$4,872.00
7/3/2023	RE	B230	Continued Review of Amended Plan and Red-Line and review of TDP.	3.9	\$1,015.00	\$3,958.50
7/5/2023	RE	B200	Communications with counsel regarding experts and next steps (.5).	0.5	\$1,015.00	\$507.50
7/5/2023	RE	B200	Review of Debtor's Motion for Order Extending the Period for Debtor to Remove Actions (.3); Review of TCC's Appeal Brief (.7); Review of Debtor's Motion for Ordinary Course Professionals (.1).	1.1	\$1,015.00	\$1,116.50
7/5/2023	RE	B230	Additional review of amended plan.	3.6	\$1,015.00	\$3,654.00

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SERVICES

Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/6/2023	RE	B200	Communications with counsel regarding appeal extension, experts, and next steps.	0.6	\$1,015.00	\$609.00
7/6/2023	RE	B200	Communications with Mediator regarding status and scheduling (.5); Review of TCC Reservation as to Debtor's Removal Period (.2); Review of TCC's Reservation as to Debtor's Motion for Ordinary Course Professional (.2); Research on estimation proceedings and notice (3.1).	4.0	\$1,015.00	\$4,060.00
7/7/2023	RE	B170	Review of Order Authorizing FCR's Retention of Bederson.	0.1	\$1,015.00	\$101.50
7/7/2023	RE	B200	Communications with counsel regarding next steps and open matters (1.4); Communications with mediators scheduling next meeting and discussing mediation status (.6); Research and analyze estimation issues and procedures (2.9).	4.9	\$1,015.00	\$4,973.50
7/10/2023	RE	B200	Review of Complaint filed against Dr. Theresa Swain Emory, Dr. Richard Lawrence Kradin, and Dr. John Coulter Maddox (.3); Communications with mediator regarding status and next steps (.7); Attending live Valadez trial closing arguments (5.4); Communications with counsel regarding Valadez trial (.3); Communications from and to counsel regarding TCC Appeal Letter to J. Shipp (.2); Review of TCC Appeal Letter to J. Shipp (.1).	7.0	\$1,015.00	\$7,105.00
7/11/2023	RE	B200	Analyze Bates White April 2023 Monthly Statement (.3); Prepare for zoom with counsel and Econ One (.5); Attend zoom with counsel and Econ One (.9); Call with counsel regarding next steps (.2).	1.9	\$1,015.00	\$1,928.50
7/11/2023	RE	B200	Research regarding future Talc claims and review of estimates (3.8); Communications with mediator regarding status (.6); Review Debtor's Motion Waiving Proof-of-Claim Requirement, Debtor's Motion to Establish Bar dates/Procedures, AHC of Supporting Firms' Motion to Seal Rule 2019 Statement, and Debtor's Motion to Authorize Retention/Compensation of Ordinary Professionals (.2); Review of Letter Order Extending Briefing Schedule for Appeal Papers (.1); Review of med truth article "Talc Victims Speak Out Against J&J" (.1); Communications with counsel regarding entries regarding analysis of future claims data (.2); Review of Debtor's Motion for Entry of Order Approving Form and Manner of Notice of Hearing on Disclosure Statement, etc. (.7).	5.7	\$1,015.00	\$5,785.50

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Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/12/2023	RE	B200	Review (continued) of Debtor's Motion for Entry of Order Approving Form and Manner of Notice of Hearing on Disclosure Statement; Approving Disclosure Statement; Establishing Solicitation and Tabulation Procedures; Scheduling a Hearing on Confirmation of Amended Chapter 11 Plan and Approving Form and Manner of Notice; and Granting Related Relief and Exhibits (4.5); Communications with counsel regarding Debtor's filing and next steps (.3); Review of Debtor's Revised Trust Distribution Procedures (1.6); Review of Order Waiving Rule 3003-1(a)(1) Requirement (.1); Review of Order Authorizing Retention of Ordinary Course Professionals (.2).	6.7	\$1,015.00	\$6,800.50
7/13/2023	RE	B200	TCC's Motion Authorizing Estimation and Appointing Ken Feinberg (.4).	0.4	\$1,015.00	\$406.00
7/13/2023	RE	B230	Review of TCC's Motion Establishing Deadline for Proof of Claims and Approving Model Claim Form (.3); Communications with counsel regarding next steps (.6); Review (continued) of Debtor's Revised Trust Distribution Procedures (4.6).	5.5	\$1,015.00	\$5,582.50
7/13/2023	RE	B170	Review of Order Granting Retention of Expert EconOne.	0.1	\$1,015.00	\$101.50
7/14/2023	RE	B200	Review and respond to MR's Motion to Disqualify FCR (2.5); Prepare for zoom with mediators and counsel set for today (.2); Zoom call with counsel to discuss next steps before the call with mediators (.5); Attending zoom with mediators and counsel (.8); Numerous calls and communications regarding response to inquiries concerning MR's Motion to Disqualify FCR (2.8).	6.8	\$1,015.00	\$6,902.00
7/15/2023	RE	B200	Communications with mediator regarding next steps (.4); Review of Order Extending Preliminary Injunction (.3); Review (continued) TCC's Motion Establishing Deadline for Proof of Claims and Approving Model Claim Form (1.5).	2.2	\$1,015.00	\$2,233.00
7/16/2023	RE	B200	Strategy and communications regarding MR Motion to Disqualify FCR.	3.4	\$1,015.00	\$3,451.00
7/17/2023	RE	B200	Zoom call with expert and counsel (.9); Analyze future claims data for additional calls with expert (1.8).	2.7	\$1,015.00	\$2,740.50

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Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/17/2023	RE	B200	Review, revise and finalize letter to J. Kaplan regarding MR's Motion to Disqualify FCR (2.3); Review of TCC's Designation of Record on FCR Appointment Appeal to District Court (.1); Review of Docket Entry on Bankruptcy Appeal (.1).	2.5	\$1,015.00	\$2,537.50
7/18/2023	RE	B200	Review MR firm's Reply to Motion to Disqualify (.2); Communications with counsel regarding same (.3); Review responses from attorneys and press on MR Motion to Disqualify FCR (1.5); Review of Valadez jury verdict information (.2); Communications with counsel regarding Valadez jury verdict (.4); Review of Clerk's Quality Control Message on Return Date for Appeal (.1).	2.7	\$1,015.00	\$2,740.50
7/18/2023	RE	B200	Review of documents provided to experts.	2.5	\$1,015.00	\$2,537.50
7/19/2023	RE	B200	Review of Declaration of Shannon Wheatman and other materials provided to and from expert EconOne (2.2); Analyze future claims data for additional calls with expert (2.8); Attend zoom call with experts (.3); Communications with counsel before and after zoom with experts (.2).	5.5	\$1,015.00	\$5,582.50
7/19/2023	RE	B200	Review of Paul Crouch (Levy Konigsberg) Proposed Findings of Fact and Conclusions of Law and Exhibits (2.2); Review of TCC Letter to Kaplan on Debtor's Demand for Certified Plan Directive and Client List and Exhibit (Letter by TCC to Debtor regarding same) (.2); Initial review of Redacted Post-Trial Brief in Support of Motion of Arnold & Itkin, on Behalf of Certain Talc Claimants, To Dismiss Chapter 11 Case (.4).	2.8	\$1,015.00	\$2,842.00
7/20/2023	RE	B200	Review of text order regarding the Motion to Disqualify (.1); Review of MR Firm's Proposed Findings of Fact and Conclusions of Law to Motion to Dismiss (1.5); Review of New Mexico and Mississippi's Post-Hearing Memorandum to Motion to Dismiss (.4); Review of AHC of Meso's Proposed Findings of Fact and Conclusions of Law to Motion to Dismiss (.1); Review of AHC of States with Consumer Claims' Findings of Fact and Conclusions of Law (.1); Analyze conclusions of law (2.9).	5.1	\$1,015.00	\$5,176.50

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Date	TMK	Task	Description of Services	Hours	Rate	Amount
7/21/2023	RE	B200	Review of Jones Day Letter to Kaplan on Plan Solicitation Directive (.1); Review of TCC's Letter Claiming Unlawful Solicitation by Debtor (.1); Communications with counsel regarding filings and next steps (.3); Communications with mediator regarding next steps (.5); Review of TCC's Notice of Appeal and Statement of Election (.1); Review of TCC's Findings of Fact and Conclusions of Law to Motion to Dismiss (2.7); Review of US Trustee's Proposed Findings of Fact and Conclusions of Law to Motion to Dismiss (.1).	3.9	\$1,015.00	\$3,958.50
7/22/2023	RE	B200	Communications with counsel regarding meeting with expert.	0.2	\$1,015.00	\$203.00
7/22/2023	RE	B200	Analyze filed proposed findings of fact.	3.2	\$1,015.00	\$3,248.00
7/23/2023	RE	B200	Review of MR Firm's Letter on Debtor's Solicitation Directive (.1); Review of Debtor's Monthly Operating Report for June 2023 (.1); Continued analysis of findings of fact and conclusions of law (4.6).	4.8	\$1,015.00	\$4,872.00
7/24/2023	RE	B200	Communications with counsel regarding next steps and meeting with expert.	0.8	\$1,015.00	\$812.00
7/24/2023	RE	B200	Communications with mediator (.7); analyze Fourth Circuit June 20, 2023 decision in Bestwall regarding appellate standing of FCR (.3); Continued review of TCC Findings of Fact and Conclusions of Law (2.2); Review of Order granting adjournment of TCC's Motions Authorizing an Estimation of Current Talc Claims for Voting Purposes, (II) Appointing Kenneth R. Feinberg as Expert Pursuant to Federal Rule of Evidence 706, and (III) Establishing Procedures and Schedule for Estimation Proceedings (.2); Review of Joint Stipulation and Agreement Order regarding admission of Exhibits and Deposition designations in connection with the MTD (.1); Emails from and to F. Yook regarding ECF Nos. 3949 and 3951 (.1).	3.6	\$1,015.00	\$3,654.00
7/25/2023	RE	B200	Email from F. Yook regarding ECF Nos. 3949 and 3951 (.1); Review of ECF Nos. 3849 and 3951 set for August 2, 2023 regarding Motions for Allowance for Substantial Contribution TCC and AWKO (1.4); Review findings and reports in other Talc BKs related to LTL (1.8); Reviewed trial testimony from Emory Valadez trial (3.5); Communications with counsel regarding next steps and meeting with expert (.3).	7.1	\$1,015.00	\$7,206.50

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7/26/2023	RE	B200	Communications with counsel regarding next steps and meeting with expert.	0.5	\$1,015.00	\$507.50
7/26/2023	RE	B200	Review of AHC of Supporting Firms' Objection to MR Firm's Motion to Disqualify FCR (.1); Review of Debtor's Objection to MR's Motion to Disqualify FCR (.2); Review of Debtor's Objection to Motions for Allowance of Substantial Contribution (.4); Reviewed trial testimony of plaintiff's experts from Emory Valadez trial (5.6).	6.3	\$1,015.00	\$6,394.50
7/27/2023	RE	B200	Pre zoom call with counsel to prepare for call with experts (.3); Zoom with counsel and experts regarding data and analysis (1.6); Call with counsel after zoom with expert (.3).	2.2	\$1,015.00	\$2,233.00
7/27/2023	RE	B200	Reviewed defendants' expert trial testimony from Emory Valadez trial.	4.9	\$1,015.00	\$4,973.50
7/28/2023	RE	B200	Communications with counsel in preparation for expert zoom today (.6); Attend zoom with counsel and expert (.6); Follow up calls with counsel regarding next steps with experts and data/document requests (.3).	1.5	\$1,015.00	\$1,522.50
7/28/2023	RE	B200	Review of Motion to Dismiss ruling (1.7); Communications with counsel regarding same (.5); Communications with other parties regarding MTD ruling (2.8).	5.0	\$1,015.00	\$5,075.00
7/29/2023	RE	B200	Communications with parties regarding Ruling on MTD and next steps.	1.8	\$1,015.00	\$1,827.00
7/31/2023	RE	B200	Review of August 2, 2023, Hearing Agenda (.2); Review of Order denying Motion to Disqualify FCR (.1); Communications with counsel regarding Order and Agenda (.1).	0.4	\$1,015.00	\$406.00
Total Professional Services				141.1		\$142,506.00

PERSON RECAP

Person	Hours	Rate	Amount
RE Randi Ellis	1.4	\$507.50	\$710.50
RE Randi Ellis	139.7	\$1,015.00	\$141,795.50

EXPENSES

Date	Task	Description of Expenses	Amount
7/10/2023	E100 - E106	CVN Invoice - watch live stream of Valdez trial closing	\$750.00

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EXPENSES

Date	Task	Description of Expenses	Amount
		Total Expenses	\$750.00
		Total Services	\$142,506.00
		Total Disbursements	\$750.00
		Total Current Charges	\$143,256.00
		Previous Balance	\$239,493.55
		Less Payments	(\$80,742.92)
		Less Retainer Applied	(\$80.00)
		PAY THIS AMOUNT	\$301,926.63

Due Upon Receipt. Please include the invoice number on all remittance. Thank you.

TASK RECAP

Services			Disbursements	
Category	Hours	Amount	Category	Amount
B170	0.20	\$203.00	E100 - E106	\$750.00
B195	1.40	\$710.50		\$0.00
B200	122.90	\$124,743.50		\$0.00
B230	16.60	\$16,849.00		\$0.00
	141.10	\$142,506.00		\$750.00